

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BRUCE HAY

Plaintiff,

v.

NEW YORK MEDIA LLC, and  
KERA BOLONIK,

Defendants.

Civil Action No. 1:20-cv-06135

**SECOND AMENDED COMPLAINT**

**Jury Trial Demanded**

**MOTION FOR LEAVE TO FILE**  
**SECOND AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 15(a)(2), Plaintiff Bruce Hay, by his attorney of record, Jillian T. Weiss, moves this Honorable Court for leave to file a Second Amended Complaint (“SAC”), filed in accordance with the Order of the Court. [ECF 30]

The Proposed Second Amended Complaint (“SAC”) deletes Count 2 from the First Amended Complaint, Defamation-Against All Defendants, in its entirety. The Proposed SAC is attached to the Declaration of Jillian T. Weiss, Esq. in Support of the Motion to Amend, filed herewith, as Exhibit A.

DATED: January 8, 2021

Respectfully submitted,

/s/ Jillian T. Weiss  
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